

Message

From: Rise, David [rise.david@epa.gov]
Sent: 3/27/2014 3:44:23 PM
To: Rathbone, Colleen [Rathbone.Colleen@epa.gov]; Kent, Bruce [Kent.Bruce@epa.gov]
CC: Vranka, Joe [vranka.joe@epa.gov]
Subject: Columbia Falls Aluminum Company

OK, I have read the entire permit and statement of basis. There is one direct discharge to surface water, outfall 006, the ground water seep to the Flathead river. They put effluent limits on that outfall for aluminum and cyanide. And there is a mixing zone. There is also a compliance schedule to put in flow monitoring at 006. Part of the effluent limits include limitations on how many potlines can operate at any one time, to keep from increasing the loading. They have five original lines (Tbar) and one add-on (sow casting), the sow casting line is equivalent to 2.5 Tbar lines. The other outfalls have monitoring points and effluent limits at the end of pipe prior to discharge into ponds, drywells or onto the ground and then a ground water mixing zone. The ground water mixing zone looks to be entirely within the plant grounds. There is also a compliance schedule to locate an upstream monitoring location that is not affected by the aluminum plant discharges. They have done reasonable potential and loading determinations and put in WQBELs for some constituents based on those. Other constituents have TBELs based on the ELG. All the standard permit language appears to be there. Don't know what else I should look at, I haven't reviewed a major facility permit before this.

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